

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

<p>REBECCA LYNNE COLBERT,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>HIGHLAND INDUSTRIES, INC., JOYSON KSS AUTO SAFETY S.A., JOYSON SAFETY SYSTEMS f/k/a KEY SAFETY SYSTEMS, HONDA MOTOR CO., LTD., HONDA R & D CO., LTD., AMERICAN HONDA MOTOR CO., INC., AND HONDA DEVELOPMENT & MANUFACTURING OF AMERICA, LLC f/k/a HONDA OF AMERICA MFG., INC.,</p> <p style="text-align: center;">Defendants.</p>	<p>CIVIL ACTION</p> <p>CASE NO.</p> <p style="text-align: center;"><u>(JURY TRIAL DEMANDED)</u></p>
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Pursuant to Rule 26.01 of the Local Civil Rules of the United States District Court for the District of South Carolina, Plaintiff Rebecca Lynne Colbert (“Plaintiff”) hereby responds to the Court’s Interrogatories.

- A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE:

Plaintiff is not presently aware of any entities with subrogation interests. Plaintiff reserves the right to supplement this response.

- B) As to each claim, state whether it should be tried jury or non-jury and why.

RESPONSE:

Plaintiff has requested a jury trial for each claim because the allegations set forth in Plaintiff’s pleadings are legal in nature. Plaintiff reserves the right to supplement this

response.

- C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE:

Plaintiff is an individual and not a publicly owned company.

- D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE:

The defective component which caused Plaintiff's injuries and is the basis of this lawsuit was manufactured in Chesterfield County which is proper to this Division and Court. Plaintiff reserves the right to supplement this response.

- E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE:

This action is not related to any other actions known to the undersigned filed in this District.

Mount Pleasant, South Carolina

Dated: July 8, 2021.

Respectfully submitted,

By: /s/ Kevin R. Dean

Kevin R. Dean, Esq.

John D. O'Neill, Esq.

MOTLEYRICE LLC

28 Bridgeside Boulevard

Mount Pleasant, South Carolina 29464

Phone: (843) 216-9000

Fax: (843) 216-9450

kdean@motleyrice.com

jdoneill@motleyrice.com
Counsel for Plaintiff